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Attorneys for Proposed Defendant-Intervenor  
ASSOCIATION OF CALIFORNIA EGG FARMERS

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA

Plaintiff,

v.

THE STATE OF CALIFORNIA; GAVIN  
C. NEWSOM, in his Official Capacity as  
Governor of California; KAREN ROSS,  
in her Official Capacity as Secretary of  
the California Department of Food &  
Agriculture; ERICA PAN, in her Official  
Capacity as Director of the California  
Department of Public Health; and ROB  
BONTA, in his Official Capacity as  
Attorney General of California,

Defendants.

Case No. 2:25-cv-06230-MCS-AGR

**NOTICE OF MOTION AND  
UNOPPOSED MOTION TO  
INTERVENE OF PROPOSED  
DEFENDANT-INTERVENOR  
ASSOCIATION OF CALIFORNIA  
EGG FARMERS**

Hearing Date: September 8, 2025  
Time: 9:00AM PT  
Location: Courtroom 7C, 7th Floor

1 **TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2 **PLEASE TAKE NOTICE** that on September 8th at 9:00 a.m., or as soon  
3 thereafter as the matter may be heard before the Honorable Mark C. Scarsi in  
4 Courtroom 7C of the United States District Court, Central District, Western Division  
5 of California, located at 350 W 1st Street, 7th Floor, Los Angeles, CA 90012-4565,  
6 Proposed Intervenor-Defendant Association of California Egg Farmers (“ACEF”),  
7 pursuant to Federal Rule of Civil Procedure 24, will and hereby does respectfully  
8 move the Court for an order granting ACEF’s intervention as a defendant.  
9  
10

11  
12 This motion is made following conferences of counsel pursuant to L.R. 7-3,  
13 which took place more than seven days before the filing of the motion. The State of  
14 California takes no position on the motion. The United States takes no position on  
15 the motion. The motion is therefore unopposed.  
16

17 This motion is made on the basis that ACEF is entitled to intervention as of  
18 right under Federal Rule of Civil Procedure 24(a)(2) because its members are  
19 California egg farmers who have a direct and substantial interest in ensuring that the  
20 California food safety and animal welfare provisions challenged in this action are  
21 upheld. ACEF’s motion is timely. ACEF has significant, legally protectable  
22 interests at stake in this action, and a decision in the United States’s favor could  
23 significantly impair ACEF’s interests. Finally, ACEF’s unique, private interests are  
24 not adequately represented by California. Alternatively, the Court should grant  
25  
26  
27  
28

1 ACEF permissive intervention under Federal Rule of Civil Procedure 24(b). In  
2 accordance with Federal Rule of Civil Procedure 24(c), ACEF has lodged a  
3 [Proposed] Answer of Intervenor- Defendant concurrently with this motion.  
4

5 This motion is made pursuant to this Notice of Motion and Motion to  
6 Intervene, the accompanying Memorandum of Points and Authorities, the  
7 concurrently filed Declaration of Debra Murdock, the Declaration of Thomas G.  
8 Saunders, the pleadings and records on file herein, and upon all other arguments and  
9 evidence that may be presented to this Court.  
10  
11

12  
13 DATED: August 1, 2025

Respectfully submitted,

14 **WILMER CUTLER PICKERING**  
15 **HALE AND DORR LLP**

16 /s/ Brian M. Boynton

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